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**VIA ELECTRONIC FILING**

Jocelyn G. Boyd  
Chief Clerk/Administrator  
**Public Service Commission of South Carolina**  
Post Office Drawer 11649  
Columbia, SC 29211

**Re: Exploration of a South Carolina Competitive Procurement Program for the Competitive Procurement of Energy and Capacity from Solar and Other Renewable Energy Facilities by an Electrical Utility as Allowed by South Carolina Code Section 58-41-20(E)(2)  
Docket No. 2019-365-E**

Dear Ms. Boyd:

I am writing on behalf of Dominion Energy South Carolina, Inc. ("DESC") in response to the Notice of Generic Hearing (the "Notice") that was issued by the Clerk's Office on October 14, 2020, in the above-referenced generic docket. The Notice established deadlines for written testimony, as well as the date for a generic hearing on the topic of competitive procurement of renewable energy in accordance with S.C. Act No. 62 of 2019 ("Act 62"). For the reasons set forth below, DESC respectfully requests that the Public Service Commission of South Carolina (the "Commission") reconsider the use of a generic docket in favor of a DESC-specific docket.

Although Act 62 states that the Commission "is authorized to open a generic docket for the purposes of creating programs for the competitive procurement of energy and capacity from renewable energy facilities,"<sup>1</sup> Act 62 clearly contemplates that such competitive procurement will be "by an electric utility within the utility's balancing authority area."<sup>2</sup> On this point, DESC has time and again provided the Commission with details about the significant saturation of renewable energy on the DESC system that would surely impact any competitive procurement process. Likewise—as the Commission noted in Order No. 2019-876 issued in December 18,

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<sup>1</sup> S.C. Code Ann. § 58-41-20(E)(2).

<sup>2</sup> *Id.* (emphasis added).

2019—this process will also overlap other areas “that involve a great deal of complexity, including the IRP process, interconnection, energy storage, and queue reform.”<sup>3</sup>

Given that issue of competitive procurement involves great complexity and the decision of whether to employ competitive procurement must account for the specific needs of the utility’s balancing authority area—as contemplated by Act 62—DESC believes that it would be in the interest of administrative economy if the Commission were to establish a docket specific to each utility to consider these issues. DESC strongly believes that considering information specific to DESC, such as its IRP, existing solar procurement, system operation, and future carbon neutral commitments in a DESC-specific docket will significantly ease the challenges on all parties that would arise from considering such wide-ranging information for each utility in a generic proceeding.

Therefore, DESC respectfully requests the Commission establish a separate docket for the consideration of whether competitive procurement programs are appropriate for DESC’s balancing authority area, and permit DESC to submit comments regarding the procedural schedule in the same.

Sincerely,



J. Ashley Cooper

JAC:hmp

Enclosure

cc: (Via Electronic Mail and First Class Mail)  
All Parties of Record

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<sup>3</sup> Order No. 2019-876, issued in Docket No. 2019-365-E on December 18, 2019.